

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ROGER MANDARELLI,)	
)	
Plaintiff,)	
)	
vs.)	C.A. No.1:16-cv-00442-S-LDA
)	
BANK OF AMERICA, N.A.;)	
FANNIE MAE AS TRUSTEE FOR)	
REMIC TRUST 2004-W3,)	
)	
Defendants.)	

JOINT STIPULATION TO EXTEND DEADLINES

Plaintiff Roger Mandarelli (the “Plaintiff”), and Defendants, Bank of America, N.A. (“BANA”), and Fannie Mae as Trustee for REMIC Trust 2004-W3 (“FNMA”) (collectively “Defendants”), to amend the stipulation entered into on or about September 21, 2017 (Doc. No. 24), hereby stipulate and agree that Defendants may have until January 15, 2018 to notice Plaintiff’s deposition in this matter. Plaintiff’s deposition is currently noticed for December 15, 2017. The Parties collectively state they are in settlement discussions which they hope will be fruitful and in order to keep costs at minimum, desire to renote the deposition for on or before January 15, 2018, if necessary. The Plaintiff was out of Rhode Island and his attorney had difficulty contacting him. The Parties further stipulate and agree that the Plaintiff and Defendants shall have thirty (30) days after said deposition to file a dispositive motion.

WHEREFORE, the Parties stipulate, and respectfully request that the Court extend the deadlines set forth in the current Pretrial Order in line with the Parties’ above stipulation.

BANK OF AMERICA, N.A.,

ROGER MANDARELLI

By its attorneys,

By his attorney,

/s/Dean J. Wagner

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Dated: December 14, 2017

/s/John B. Ennis

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Dated: December 14, 2017

CERTIFICATE OF SERVICE

I John H. McCann, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 29, 2017.

/s/John H. McCann